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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

HASHEEM BOUDJERADA; DAMON
COCHRAN-SALINAS; ERIN GRADY;
TYLER HENDRY; and KIRTIS
RANESBOTTOM,

Plaintiffs,

v.

CITY OF EUGENE; SARAH MEDARY;
WILLIAM SOLESBEE; SAMUEL STOTTS;
BO RANKIN; TRAVIS PALKI; MICHAEL
CASEY; RYAN UNDERWOOD; CRAIG
WRIGHT; CHARLES SALSBUURY; and
CHIEF CHRIS SKINNER,

Defendants.

Case No. 6:20-cv-1265-MK

DECLARATION OF MARIANNE
DUGAN IN SUPPORT OF RESPONSE TO
DEFENDANT CHIEF CHRIS SKINNER'S
MOTION FOR SUMMARY JUDGMENT

1. I am one of the attorneys for the plaintiffs in this case. I make the statements in this declaration based upon my personal knowledge. I am competent to testify to the matters stated herein.

2. Attached are the following Exhibits referred to in Plaintiffs' Response to Defendant Skinner's Motion for Summary Judgment:

Exhibit 1 - Medary Deposition Transcript

Exhibit 2 - Administrative Order No. 21-20-10

Exhibit 3 - Underwood Deposition Transcript

Exhibit 4 - Administrative Order No. 21-20-11

Exhibit 5 - First Cochran-Salinas Deposition Transcript

Exhibit 8 - First Boudjerada Deposition Transcript

Exhibit 9 - Stotts Deposition Transcript

Exhibit 10 - First Raneshottom Deposition Transcript

Exhibit 11 - First Grady Deposition Transcript

Exhibit 12 - Raneshottom Declaration

Exhibit 13 - Hendry First Declaration

3. I will be separately filing the following exhibits:

Exhibit 6 - Klinko Deposition Transcript – portions will be filed under seal because they were agreed as confidential during the deposition; portions will be filed not under seal.

Exhibit 7 - Skinner Deposition Transcript – portions will be filed under seal because they were agreed as confidential during the deposition; portions will be filed not under seal.

Exhibit 14 – EPD radio traffic recording – to be submitted via flash drive – File name is EPD CH4.053120 20-00-17 TO 23-59-40

Exhibit 15 -- Stotts bodycam recording – to be submitted via flash drive --
File name BWC: INFORMATION- _BOTH_PD_AND_FD__STOTTS_SAMUEL
2__053120_11_57_47.mp4

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 15, 2025, at Eugene, Oregon.

/s/ Marianne Dugan
Marianne Dugan